

BEFORE THE PUBLIC SERVICE COMMISSION
OF
SOUTH CAROLINA

DOCKET NO. 2021-210-E

Request of Clifton Power Company on the)	
Public Service Commission's Jurisdiction of)	PETITION TO INTERVENE
Electric Vehicle Charging Stations)	OF THE ELECTRIC COOPERATIVES
)	OF SOUTH CAROLINA, INC. AND
)	CENTRAL ELECTRIC POWER
)	COOPERATIVE, INC.

Pursuant to Public Service Commission Regulation 103-825, and other applicable provisions of the Commission's Rules of Practice and Procedure, Central Electric Power Cooperative, Inc. ("Central") and The Electric Cooperatives of South Carolina, Inc. ("ECSC") (jointly referred to as the "Petitioners") hereby file this Petition to Intervene in the above-captioned proceeding. In support of this Petition, Central and ECSC state as follows:

1) Central is a not-for-profit generation and transmission electric cooperative formed under S.C. Code Section 33-49-10, *et. seq.* Central's principal place of business and mailing address is 20 Cooperative Way, Columbia, SC 29210. Central is engaged in the purchase, transmission, and sale of electric power to twenty electric distribution cooperatives throughout South Carolina. Central's distribution cooperative members provide electric power to over 700,000 homes, businesses, and industrial members throughout all forty-six South Carolina counties and a small portion of North Carolina.

2) ECSC is the state-wide service and trade association for electric cooperatives in South Carolina. Its members are eighteen of the twenty consumer-owned electric cooperatives, one wholesale power supply cooperative, one transmission service cooperative, and one materials supply cooperative. ECSC serves as a legal and regulatory representative of its member electric

cooperatives. Together, ECSC's members operate the largest electric distribution system in the state. More than 1.5 million South Carolinians in all forty-six counties use electricity from electric cooperatives. ECSC's principal place of business is 808 Knox Abbot Drive, Cayce, South Carolina 29033.

3) Pursuant to Rule R. 103-804(S) of the Commission's Rules of Practice and Procedure, Petitioners are represented by counsel in this proceeding:

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4) The Commission opened this proceeding on the request of Clifton Power Company ("Clifton"), a manufacturer and installer of electric vehicle charging stations in South Carolina, filed June 18, 2021.

5) In its request, Clifton says that its charging stations are located throughout the state in service areas assigned to investor-owned utilities, the South Carolina Public Service Authority ("Santee Cooper"), and electric cooperatives.

6) Clifton requests the Commission's opinion of its jurisdiction over different arrangements for the supply of power to the charging stations by a "regulated utility" or an "unregulated entity."

7) Central and the electric cooperatives have installed and operated electric vehicle charging stations since 2011 in various locations around the state.

8) On March 10, 2022, the Commission directed its Clerk to schedule this matter for a hearing and set an intervention date for any interested stakeholders.

9) Considering the above, the Petitioners have standing to intervene in the proceeding and represent the interests of their members. Petitioners and their member cooperatives have a direct and material interest in the issues to be addressed and resolved by the Commission, and no other party can represent their interests; furthermore, Petitioners' involvement in these proceedings will promote the public interest by furthering the development of consistent EV charging station policies among the state's electricity providers.

WHEREFORE, Petitioners pray that they will be allowed to intervene in this docket and all related proceedings, including, but not limited to, the ability to appear as parties, engage in discovery, and participate in all hearings by offering testimony and exhibits and cross-examining witnesses. Petitioners request the receipt of all notices, documents, exhibits, and data submitted by all parties and the Commission's staff.

Respectfully submitted,

s/ John H. Tiencken, Jr.

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April 26, 2022

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